COS

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

SECURITIES AND EXCHANGE COMMISSION, :

Plaintiff,

-v.-

Case No. 07 Cu. 9606

OLEKSANDR DOROZHKO

Defendant,

NOTICE OF PLAINTIFF SECURITIES AND EXCHANGE COMMISSION'S EMERGENCY APPLICATION FOR A TEMPORARY RESTRAINING ORDER, AN ORDER FREEZING ASSETS AND GRANTING OTHER RELIEF, AND AN ORDER TO SHOW CAUSE WHY A PRELIMINARY INJUNCTION SHOULD NOT ISSUE

Plaintiff Securities and Exchange Commission, through its counsel, respectfully moves for a temporary restraining order, an order freezing assets and granting other relief, and an order to show cause why a preliminary injunction should not issue. In bringing this application, the SEC relies on:

- 1. the Complaint;
- the Memorandum Of Law In Support Of Emergency Application For A Temporary
 Restraining Order, An Order Freezing Assets And Granting Other Relief, And An
 Order To Show Cause Why A Preliminary Injunction Should Not Issue;
- 3. Local Rule 6.1(d) Declaration Of Paul A. Gumagay In Support Of Plaintiff's Emergency Application For A Temporary Restraining Order, An Order Freezing Assets And Granting Other Relief, And An Order To Show Cause Why A Preliminary Injunction Should Not Issue; and
- 4. the Declaration of Paul A. Gumagay and exhibits attached thereto.

Robert B. Blackburn (RB 1545)

Local Counsel

U.S. Securities and Exchange Commission 3 World Financial Center, Room 4300

New York, New York 10281-1022

(212) 336-1050

(212) 336-1317 (Fax)

Respectfully submitted,

Carl A. Tibbetts (Trial Counsel)

Christopher R. Conte

Charles E. Cain

Christine E. Neal

Paul A. Gumagay (PG0805)

Attorneys for Plaintiff

U.S. Securities and Exchange Commission

100 F Street, N.E.

Washington, DC 20549-4030

(202) 551-4483 (Tibbetts)

(202) 551-4443 (Gumagay)

(202) 772-9233 (Fax)